

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,
Plaintiff,
vs.
DAVID REID, et al.,
Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID
TO EXTEND FLIGHT TIME UNTIL JULY 20, 2006**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to extend the flight time until July 20, 2006. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from flying an aircraft.
2. On June 27, 2006, this Honorable Court entered an order allowing Mr. Reid to fly an aircraft June 27, 2006 through July 10, 2006.
3. Mr. Reid was hired by Constellation Aircraft Management, LLC to fly a King Air A-90, aircraft # N761K, during the period of June 27, 2006 through July 10, 2006. However, the aircraft has experienced a variety of mechanical problems. A copy of the work order from Cutter Aviation is attached hereto as Exhibit "A". As a result of the unforeseen mechanical problems, the flight will now extend beyond July 10, 2006.

4. Mr. Reid would like to fulfill his obligation to Constellation Aircraft Management, LLC and continue his flight through July 20, 2006.

5. Undersigned counsel contacted Assistant United States Attorney General James Braun on July 7, 2006 and he indicated that he had no objection to Mr. Reid's request to extend his flight time to July 20, 2006.

6. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Nick Romero, on July 7, 2006 and he indicated that he had no objection to Mr. Reid's request to extend his flight time to July 20, 2006.

7. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Suzette Frisby, on July 7, 2006 and she stated that she had no objection to Mr. Reid's request to extend his flight time to July 20, 2006.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to fly an aircraft until July 20, 2006.

RESPECTFULLY SUBMITTED this 7th day of July, 2006.

/s/ electronically signed

ZUBAIR ASLAMY
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I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 7th day of July, 2006.

/s/ electronically signed

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